

IN THE DISTRICT COURT WITHIN AND FOR SEMINOLE COUNTY,  
STATE OF OKLAHOMA

SEMINOLE COUNTY, OKLAHOMA  
FILED  
IN DISTRICT COURT  
MAY 9 2023  
AMERICAN  
COURT CLERK  
DEPUTY  
By  
K.D.  
100

SEAN BREWER and JANET BREWER, )  
Husband and Wife, )  
Plaintiffs, )  
vs. )  
ENERFIN RESOURCES I LP, dba )  
ENERFIN RESOURCES COMPANY, )  
A Texas Limited Partnership, )  
Defendant. )

CJ-2023- 57

**PETITION**

COME now the PLAINTIFFS, SEAN BREWER and JANET BREWER, Husband and Wife, and for their PETITION, allege and state as follows, to-wit:

1. THAT at all times mentioned herein, PLAINTIFFS were, and still are, the owners of the following described real property situated in Seminole County, Oklahoma, to-wit:

**The South Half of the Northeast Quarter of the Northeast Quarter (S/2 NE/4 NE/4) of Section Twenty-Five (25), Township Ten (10) North, Range Seven (7) East, Seminole County, Oklahoma, less and except all oil, gas and other minerals.**

2. THAT at all times mentioned herein, DEFENDANT, ENERFIN RESOURCES I LP, was and still is, a Texas Limited Partnership.

3. THAT DEFENDANT claims that it has a pipeline easement over and across PLAINTIFFS' property situated in Seminole County, Oklahoma, but PLAINTIFFS deny such claim and demands strict proof thereof.

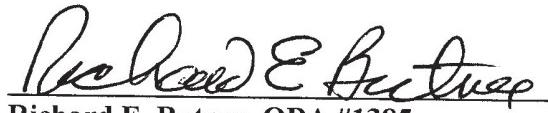
4. THAT on or about the 11<sup>th</sup> day of June, 2021, and for a time thereafter, DEFENDANT'S pipeline leaked Oil and/or other caustic substances over and upon the real property owned by the PLAINTIFFS described above.

5. THAT the leak was caused by the negligence of the DEFENDANT in the operation of it's pipeline easement and/or trespass over and upon PLAINTIFFS' property..

6. THAT as a direct and proximate result of DEFENDANT'S negligence, PLAINTIFFS have suffered damages IN EXCESS OF TEN THOUSAND (\$10,000.00) dollars.

7. THAT in the alternative, or in addition to actual damages, PLAINTIFFS are entitled to Punitive Damages in an amount in excess of TEN THOUSAND DOLLARS, (\$10,000.00).

WHEREFORE, premises considered, PLAINTIFFS pray that upon the trial of this matter that they be granted judgment against the DEFENDANT for damages IN EXCESS OF TEN THOUSAND DOLLARS, (\$10,000.00), Punitive Damages in excess of TEN THOUSAND DOLLARS, (\$10,000.00), their Attorney's Fees, Costs, and other relief proper in the premises.



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Attorneys for PLAINTIFFS

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STATE OF OKLAHOMA )  
                      )  
COUNTY OF SEMINOLE ) ss      Verification

We, SEAN BREWER and JANET BREWER, Husband and Wife, after being duly sworn upon our oaths, state as follows, to-wit:

THAT we have read the attached PETITION and are familiar with the contents therein.

THAT the contents are true and correct to the best of our knowledge and belief.

Sean Brewer  
Sean Brewer, Plaintiff  
Janet Brewer  
Janet Brewer, Plaintiff

Subscribed and sworn to before me this 22<sup>nd</sup> day of May, 2023.

Tina Butner  
Notary Public

SEAL



EXHIBIT 1